

REMARKS

Claims 1-9, 11-13, 15-39 were pending as of the final office action mailed January 15, 2008.

This reply is being filed with a Request for Continued Examination.

Reconsideration is respectfully requested in view of the following remarks.

§ 103 REJECTIONS

Claims 1-9, 11-13, and 15-39 were rejected under 35 U.S.C. § 103 as allegedly unpatentable over a 2001 archival copy of a page in the D-Cubed corporate website(the “D-Cubed reference”) in view of a January 2002 manual for the 2D Dimensional Constraint Manager (the “2D DCM Manual) and in further view of a 1994 manual for KeyCad (“KeyCad”). The rejections are respectfully traversed.

Claim 1 recites, in part, “receiving an input for a pattern, the pattern comprising a plurality of features enclosed within a boundary of a CAD geometry piece where a feature corresponds to a feature of the CAD geometry piece.” (Emphasis added)

The Examiner conceded that neither the D-Cubed reference nor the 2D DCM Manual teaches this feature, but then cited KeyCad as allegedly teaching this feature. KeyCad is understood to disclose a “Group” feature that lets a user consolidate multiple objects into one group. The grouping enables the grouped objects to be manipulated as one object. KeyCad, p. 9-6. For example, the grouped objects can be moved together.

The grouping feature as disclosed in KeyCad is not the same as the feature recited in the claim. The claim recites “a plurality of features enclosed within a boundary of a CAD geometry piece.” The grouping feature disclosed in KeyCad, however, does not enclose objects within a boundary of a CAD geometry piece. The grouped pieces in KeyCad are not enclosed within another CAD geometry piece by the grouping feature. Rather, the grouping in KeyCad is merely a temporary consolidation of multiple objects for ease of manipulation.

For the reasons stated above, KeyCad does not teach the recited feature. The Examiner had already conceded that the D-Cubed reference and the 2D DCM Manual do not teach the

feature. Thus, the combination of the D-Cubed reference, the 2D DCM Manual, and KeyCad does not teach all limitations of the claim. Withdrawal of the rejection is respectfully requested.

Claims 2-9, 11, and 34-35 depend from claim 1, and are allowable for at least the reasons stated above.

Claim 12 recites instructions that cause an apparatus to “receive an input corresponding to generation of a pattern in a computer aided design (CAD) geometry piece, the pattern comprising a plurality of features enclosed within a boundary of the CAD geometry piece where a feature corresponds to a feature of the CAD geometry piece.” As stated above, the combination of the D-Cubed reference, the 2D DCM Manual, and KeyCad does not teach features enclosed within a boundary of the CAD geometry piece. Thus, claim 12 is in condition for allowance.

Claims 13, 15-22, and 36-37 depend from claim 12, and are allowable for at least the reasons stated above.

Claim 23 recites instructions that cause a machine to “receive an input for a pattern, the pattern comprising a plurality of features enclosed within a boundary of a CAD geometry piece where a feature corresponds to a feature of the CAD geometry piece.” As stated above, the combination of the D-Cubed reference, the 2D DCM Manual, and KeyCad does not teach features enclosed within a boundary of the CAD geometry piece. Thus, claim 23 is in condition for allowance.

Claims 24-33, 38-39 depend from claim 23, and are allowable for at least the reasons stated above.

## CONCLUSION

For the foregoing reasons, the applicant submits that the pending claims are in condition for allowance.

By responding in the foregoing remarks only to particular positions taken by the examiner, the applicant does not acquiesce with other positions that have not been explicitly addressed. In addition, the applicant’s selecting some particular arguments for the patentability of a claim should not be understood as implying that no other reasons for the patentability of that claim exist. Finally, the applicant’s decision to amend or cancel any claim should not be

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understood as implying that the applicant agrees with any positions taken by the examiner with respect to that claim or other claims.

Please apply any charges or credits to deposit account 06-1050.

Respectfully submitted,

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